

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian  
corporation; MINEDMAP, INC., a Nevada  
corporation; and SERENITY ALPHA, LLC, a  
Nevada limited liability company,

Plaintiff, :

against :

NORTHWAY MINING, LLC, a New York  
limited liability company; MICHAEL  
MARANDA, an individual; MICHAEL CARTER,  
an individual; CSX4236 MOTORCYCLE  
SALVAGE, LLC, a New York limited liability  
company; DROR SVORAI, an individual;  
MINING POWER GROUP, INC., a Florida  
corporation; HUDSON DATA CENTER, INC, a  
New York Corporation,

Defendants. :

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1:19-CV-00501-TJM-CFH

NOTICE OF MOTION TO  
ISSUE CONTEMPT CITATION  
AGAINST DEFENDANTS

Plaintiffs, Serenity Alpha, LLC, et al., file this Motion seeking an issuance of Contempt Citation against Defendants Michael Carter, Michael Maranda, Northway Mining, and the other named Defendants. In support of this Motion, Plaintiffs state as follows:

On June 19, 2020, this Court ordered Plaintiffs to disclose where Defendants were holding Plaintiffs' miners and to account to Plaintiffs for \$600,000.00 in deposits Plaintiffs paid to Defendants. This Court also ordered Defendants to refrain from moving Plaintiffs' miners without this Courts' permission. Defendants have failed to comply with this Court's order in that Defendants have not disclosed all the locations where they are hiding Plaintiffs' miners, Defendants have wholly and purposefully refused to account for the \$600,000.00 Plaintiffs paid to Defendants, and Defendants have been moving and are planning on moving Plaintiffs' miners out of New York—all in violation of this Court's Order.

As detailed in the Motion for Contempt, Plaintiffs seek a contempt citation against Defendants because Defendants violated a clear and unambiguous order that this Court issued. See, e.g., *Am. Honda Motor Co. v. V.M. Paolozzi Imps. Inc.*, 2012 U.S. Dist. Lexis 125150 (N.D.N.Y. 2012 Sept. 1, 2012). Plaintiffs also seek their reasonable attorney fees and costs against Defendants and against Defendants' counsel, to the extent Defendants' counsels were complicit in getting Plaintiffs to violate this Court's Order. See *id.*

July 13, 2020  
New York, New York

RESPECTFULLY SUBMITTED,

By: /s/ T. Edward Williams, Esq.

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